

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Tabitha L. Tkacs	:	
Michael W. Tkacs	:	
Debtors	:	
	:	CHAPTER 13
Pingora Loan Servicing, Inc.	:	
Movant	:	Case No. 15-14981-ELF
v.	:	Hearing Date: 01-30-2018 at 9:30 am
	:	
Tabitha L. Tkacs	:	11 U.S.C. 362
Michael W. Tkacs	:	
Respondent	:	
	:	
William C. Miller, Esq.	:	
Trustee	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

And now Tabitha L. Tkacs and Michael W. Tkacs, by their attorney, Stephen M. Dunne, Esquire answers the request for relief from the automatic stay and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied.
7. Denied.
8. Denied.
9. Denied.
10. Denied.
11. Denied.

WHEREFORE, debtor requests that the motion for relief from the automatic stay be denied.

Respectfully submitted,

Stephen M. Dunne, Esquire
/s/ Stephen M. Dunne
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